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12 TECHNICAL LED INTELLECTUAL PROPERTY, LLC

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15

16 TECHNICAL LED INTELLECTUAL  
17 PROPERTY, LLC, a Delaware limited  
liability company,

18 Plaintiff,

19 v.

20 AEON LABS, LLC, a California limited  
21 liability company,

22 Defendant.  
23  
24

Case No. 3:18-cv-01847-WHA

**DECLARATION OF LOUIS M.  
HEIDELBERGER IN SUPPORT OF  
REFILED ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL DOCUMENTS IN  
SUPPORT OF PLAINTIFF'S MOTION FOR  
DEFAULT JUDGMENT AGAINST AEON  
LABS, LLC**

**COMPLAINT FILED: 03/26/2018**

- 25
- 26 1. I am attorney for Technical LED Intellectual Property LLC. ("Tech LED").
- 27 The following is within my personal knowledge and if called upon as a
- 28 witness, I could and would competently testify thereto as follows.

2. On October 28, 2019, Tech LED filed an Administrative Motion to file specified documents under seal. DKT No.44. By Order dated December 2, 2019, the Court denied the originally filed motion but granted leave to file a revised Administrative Motion to Seal within three days. DKT No. 48.
3. This declaration ("Seal Dec. LH") is in support of Tech LED's revised administrative motion to seal selected documents filed concurrently herewith.
4. Non-public versions of Exhibits 1-A and 1-B, to Seal Dec LH, namely Exhibits "G" (as corrected) and "H" to the Declaration of LH in support of its Memorandum and Evidence in Support of Plaintiff's Request for Remedies (DKT No. 45); namely, (1) Amazon Confidential Sales Data of Defendant, Ex G; and (2) highly confidential information summarizing Settlement Agreements between Tech LED and Defendants that were prosecuted by Tech LED and the actual Settlement Agreements, Ex H were filed on October 28, 2018 (DKT # 45).
5. These documents were submitted in support of Technical LED's Memorandum and Evidence in Support of Plaintiff's Request for Remedies against Defendant in connection with Plaintiff's Request for Default Judgment (DKT # 45). This application is made on the basis that one of the documents produced by Amazon pursuant to Plaintiff's Subpoena of Amazon, Exhibit "G," is designated as "Amazon Confidential" and the summary page and documents in Exhibit H are highly confidential and by agreement between Tech LED and the Defendants that have entered into Settlement Agreements with Plaintiff are required to be designated as "HIGHLY CONFIDENTIAL - ATTORNEY'S EYES ONLY." Seal Dec. LH, p. 2.

1           6.    As regards Exhibit G, above, it was set forth in the Court's Decision (DKT 49, p.6)  
2                   that the Court had to manually add up the sales. Upon my investigation, I realized  
3                   that the incorrect Pivot/summary was provided. In Ex. 1, I have inserted the  
4                   correct Pivot summary for Aeotec products which are the products of Defendant,  
5                   Aeon Labs, LLC.

6           7.    This request is narrowly tailored to seal only that material for which good cause to  
7                   seal has been established.  
8

9  
10  
11           I declare under penalty of perjury under the laws of the State of California and the laws  
12           of the Commonwealth of Pennsylvania that the foregoing is true and correct.  
13

14           Dated: December 3, 2019

15           By: /s/Louis M. Heidelberg  
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